

Geoffrey H. Coll, Esquire
SCHIFF HARDIN LLP
666 Fifth Avenue, 17th Floor
New York, NY 10103
Tel: (212) 745-9551

Attorney for Defendants Wang Hongjun and
Sun Jishuang

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

-against-

CHINA NORTHEAST PETROLEUM
HOLDINGS LIMITED; WANG HONGJUN
(a/k/a/ Hongjun Wang); JU GUIZHI (a/k/a
Guizhi Ju); and JIANG CHAO (a/k/a Chao
Jiang),

Defendants,

JIANG MINGFU (a/k/a Mingfu Jiang); and
SUN JISHUANG (a/k/a Jishuang Sun),

Relief Defendants.

INDEX NO. 12 CV 8696

**MOTION TO ADMIT COUNSEL PRO HAC
VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Geoffrey H. Coll, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicants' Names: Ralph V. De Martino
Firm Name: Schiff Hardin LLP
Address: 901 K Street, NW
City/State/Zip: Washington, DC 20006
Telephone/Fax: 202 778-6400/202 778-6460
Email Address: rdemartino@schiffhardin.com

Mr. De Martino is a member in good standing of the District of Columbia bar.

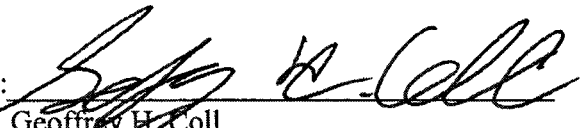
There are no pending disciplinary proceedings against Mr. De Martino in any State or Federal Court

April 11, 2013

Respectfully submitted,

Schiff Hardin LLP

By:

A handwritten signature in black ink, appearing to read "Geoffrey H. Coll", is written over a horizontal line.

Geoffrey H. Coll

SDNY Bar No. GC2020

666 Fifth Avenue, 17th Floor

New York, NY 10103

212 745-9551 (Telephone Number)

212 753-5044 (Facsimile Number)

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Geoffrey H. Coll, Esquire
SCHIFF HARDIN LLP
666 Fifth Avenue, 17th Floor
New York, NY 10103
Tel: (212) 745-9551

Attorney for Defendants Wang Hongjun and
Sun Jishuang

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

-against-

CHINA NORTHEAST PETROLEUM
HOLDINGS LIMITED; WANG HONGJUN
(a/k/a/ Hongjun Wang); JU GUIZHI (a/k/a
Guizhi Ju); and JIANG CHAO (a/k/a Chao
Jiang),

Defendants,

JIANG MINGFU (a/k/a Mingfu Jiang); and
SUN JISHUANG (a/k/a Jishuang Sun),

Relief Defendants.

INDEX NO. 12 CV 8696

**AFFIDAVIT OF GEOFFREY H. COLL IN
SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

State of New York)
) ss:
County of New York)

Geoffrey H. Coll, being duly sworn, hereby deposes and says as follows:

1. I am a partner at the law firm of Schiff Hardin LLP, counsel for Defendants Wang Hongjun and Sun Jishuang in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Ralph V. De Martino as counsel pro hac vice to represent Defendants in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1989. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Mr. De Martino since November 2012.

4. Mr. De Martino is a partner at Schiff Hardin LLP in Washington, DC.

5. I have found Mr. De Martino to be a skilled attorney and person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Ralph V. De Martino, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Ralph V. De Martino, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Ralph V. De Martino, pro hac vice, to represent Defendants in the above-captioned matter, be granted

April 11, 2013
New York, NY

Respectfully submitted,

Schiff Hardin LLP

By: 

Geoffrey H. Coll
SDNY Bar No. GC2020
666 Fifth Avenue, 17th Floor
New York, NY 10103
212 745-9551 (Telephone Number)
212 753-5044 (Facsimile Number)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

-against-

CHINA NORTHEAST PETROLEUM
HOLDINGS LIMITED; WANG HONGJUN
(a/k/a/ Hongjun Wang); JU GUIZHI (a/k/a
Guizhi Ju); and JIANG CHAO (a/k/a Chao
Jiang),

Defendants,

JIANG MINGFU (a/k/a Mingfu Jiang); and
SUN JISHUANG (a/k/a Jishuang Sun),

Relief Defendants.

INDEX NO. 12 cv 8696

**ORDER FOR ADMISSION PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Geoffrey H. Coll, attorney for Defendants Wang Hongjun (a/k/a Hongjun Wang) and Relief Defendant Sun Jishuang (a/k/a Jishuang Sun) and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicants' Names: Ralph V. De Martino
Firm Name: Schiff Hardin LLP
Address: 901 K Street, NW
City/State/Zip: Washington, DC 20006
Telephone/Fax: 202 778-6400/202 778-6460
Email Address: rdemartino@schiffhardin.com

is admitted to practice pro hac vice as counsel for Defendants Wang Hongjun (a/k/a Hongjun Wang); and Relief Defendant Sun Jishuang (a/k/a Jishuang Sun), in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing

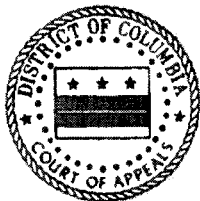
before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

United States District/Magistrate Judge

DC\80530063.2



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

RALPH V. De MARTINO

was on DECEMBER 17, 1979, duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on April 10, 2013.

JULIO A. CASTILLO
Clerk of the Court

By: *Brenda A. Simpson*
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff.

INDEX No.: 12CV8696

-against-

AFFIDAVIT OF SERVICE BY MAIL

CHINA NORTHEAST PETROLEUM HOLINGS
LIMITED, et al.,

Defendants.

JIANG MINGFU (a/k/a Mingfu Jiang) and SUN
JISHUANG (a/k/a Jishuang Sun)

STATE OF NEW YORK:

SS.:

COUNTY OF NEW YORK:

I Sybrandt O. Davis, being duly sworn, depose and say:

- 1) I am not a party to the above action, am over 18 years of age and reside in Kings County, New York.
- 2) On April 12, 2013, I served via First Class U.S. Mail, a true and correct copy of Motion to admit Counsels Leslie Ann Maria and Ralph V. De Martino Pro Hac Vice and supporting papers upon the following individuals:

Alexander Maicea Vasilescu
U.S. Securities and Exchange Commission
Three World Financial Center
New York, NY 10281

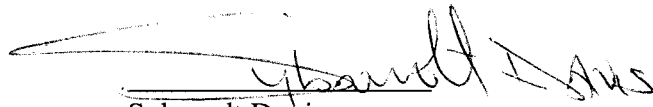
Alfred A. Day
U.S. Securities and Exchange Commission
100 F. Street, N.E.
Washington, DC 20549

Michael J Coffinao
The Crone Law Group
101 Montgomery Street, Suite 1950
San Francisco, CA 94104

Jaime Jane Santos
The Crone Law Group
101 Montgomery Street, Suite 1950
San Francisco, CA 94104

Michael Li-Ming Wong
Gibson, Dunn & Crutcher, LLP
555 Madison Street, Suite 3000
San Francisco, CA 94105

Thad Davis
Gibson, Dunn & Crutcher, LLP
555 Madison Street, Suite 3000
San Francisco, CA 94105


Sybrandt Davis

Sworn to before me this
12th day of April, 2013


Notary Public

LAURA A. FACOPOULOS Suffolk
NOTARY PUBLIC, State of ~~New York~~
No. 01-FA5070696
Qualified in Queens County
Commission Expires Dec. 23, 2014